

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

August 28, 2002

In the Matter of)
)
TELECOMMUNICATION RELAY SERVICE) CC Docket No. 98-67
AND SPEECH-TO-SPEECH SERVICES)
FOR INDIVIDUALS WITH)
HEARING AND SPEECH DISABILITIES)

**COMMENTS OF
COMMUNICATION SERVICE FOR THE DEAF, INC.**

On July 29, 2002, the FCC issued a Public Notice relating to the Report and Order and Further Notice of Proposed Rule Making released in March 2000. This Public Notice titled "Pleading Cycle Established For Comment on Clarifications of Procedures for Emergency Calls at Telecommunications Relay Service (TRS) Centers addresses an issue of concern to Communication Service for the Deaf, Inc., a South Dakota non-profit corporation ("CSD"), engaged in the business of providing services to deaf and hard of hearing individuals, including telecommunications relay services and Video Relay Services ("VRS"). CSD respectfully submits its comments on clarification of procedures for emergency calls at telecommunications relay services (TRS) centers. The Commission has specifically asked for comment on the proposal to require TRS providers to use a system for emergency calls which would automatically and immediately transfer a caller to the most appropriate PSAP facility.

CSD believes that the assignment of the location of VRS callers when using the Internet to complete VRS calls will create significant technical barriers to a VRS provider's ability to comply with this proposed change in telecommunications relay service procedures generally. Currently, Internet-based VRS callers using CSD's platform provide customer information as part of the profile registration information required to gain access. However, these Internet VRS callers may or may not be accessing the service from the particular address that was submitted and entered into the customer's profile at any particular time. Defining what the *most appropriate* PSAP would be for an Internet VRS caller at any particular moment would generally require agent interaction with the caller to verify location and could not at this time rely solely on automated support.

CSD also believes that if a viable technical solution is subsequently developed which can accurately assign Internet VRS calls to a particular physical location, it would be imperative that VRS providers be given adequate notice and time in which to incorporate this technology into their platforms which currently supports Internet VRS callers. VRS providers would likewise need provision for recovery of the additional costs resulting from such incorporation, as determined reasonable through the responsible funding authorities.

In sum, CSD supports the Commission's current waiver for emergency call processing specific to VRS calls. The proposal to automatically and immediately transfer calls to the *most appropriate* PSAP should not be applied to VRS calls until such time when there exists demonstrated reliable solutions of determining the actual location of the users of VRS accessing the service through the internet.

Respectfully submitted,

Communication Service for the Deaf, Inc.

John F. Archer, attorney for Communication Service for the Deaf

Hagen, Wilka & Archer, P.C.

100 S. Phillips Avenue, Suite 418

Sioux Falls, SD 57104

(605) 334-0005

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